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March 17, 2023

**VIA ECF**

The Honorable Brian M. Cogan  
United States District Judge  
U.S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Force, et al. v. Qatar Charity, et al.*, No. 1:20-cv-2578—  
Letter Regarding Supplemental Authority**

Dear Judge Cogan:

On behalf of Defendant Qatar Charity, we respectfully write to notify the Court of the following supplemental authority in further support of its pending motion to dismiss (ECF No. 57): *Przewozman et al. v. Qatar Charity et al.*, 1:20-cv-6088 (NGG)(TAM) (E.D.N.Y. March 17, 2023) (dismissing complaint without prejudice). A copy of the order is attached as **Exhibit A**.

Respectfully submitted,

/s/ John M. Hillebrecht  
John M. Hillebrecht

*Counsel for Qatar Charity*

Encl.

cc: All counsel of record (by ECF)